



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TH/EJD/AP
F. #2020R00708

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 5, 2024

By ECF

The Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Cory Martin
Criminal Docket No. 20-549 (S-1) (AMD)

Dear Judge Donnelly:

The government respectfully submits this letter to supplement its previously-filed motions in limine, ECF Docket Entry No. 95. In addition to the evidence outlined in the motions in limine, the government also anticipates introducing records from insurance companies reflecting that CW-1 and the defendant took out life insurance policies on CW-1's child and the father of her child, and testimony from CW-1 that the defendant made several attempts to surveil the father of CW-1's child with the intention of killing him.

Further, as set forth in the government's previously-filed motions in limine, the government expects the evidence to reflect that the defendant possessed at least one firearm, which he used to threaten CW-1, CW-1's child, and Odom. The government further expects that Witness-1 will testify that in 2017, he provided the defendant with a firearm at the defendant's request and then later asked for the firearm to be returned, referring (in code) to the firearm as a woman. Witness-1 will testify that the defendant apparently misunderstood Witness-1 and brought Brandy Odom, the victim, to Witness-1's home instead of the firearm.

This evidence is admissible because it is both inextricably intertwined with, and direct evidence of, the charged murder-for-hire conspiracy, as set forth in detail in the government's memorandum of law in support of its motions in limine. It is also likely that the defendant will wish to cross-examine CW-1 about her participation in these schemes, and Witness-1 about his possession of firearms.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Counsel of record (by ECF)
Clerk of Court (AMD) (by ECF)